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21 UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

22 MARVIN ROBERTS, EUGENE VENT,  
23 KEVIN PEASE, and GEORGE FRESE,

Case No. 4:17-cv-00034-SLG  
Case No. 4:17-cv-00035-SLG

24 Plaintiffs,  
v.

Consolidated Cases

25 CITY OF FAIRBANKS, *et al.*,

26 Defendants.

27 **JOINT STATUS UPDATE**

JOINT STATUS UPDATE - 1  
*ROBERTS, ET AL. V. CITY OF FAIRBANKS, ET AL.*  
CASE NOS. 4:17-cv-00034-SLG; 4:17-cv-00035-SLG

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In response to the Court's order of October 27, 2021 (ECF No. 127), the parties write to jointly update the Court on the status of discovery in this matter.

The parties have recently exchanged written discovery and made initial productions of documents. Although Plaintiffs have already produced a large number of responsive documents, they are also still in the process of gathering and reviewing all relevant records in the possession of their former counsel, and intend to produce additional documents as soon as practicable. The parties are also awaiting further subpoena responses from the State of Alaska, Departments of Law and Administration. In addition, Plaintiff has requested that the State of Alaska waive privilege over certain documents that it has held back as privileged in responding to the parties' subpoenas, and the State of Alaska is considering this request.

After written discovery is complete, the parties anticipate scheduling several depositions. In light of the pace of rolling document production by the State of Alaska, Plaintiff's intention to produce additional documents, the outstanding question of the State of Alaska's waiver of privilege, and the upcoming holiday season, it is likely that depositions will be scheduled for January, February, and/or March 2022.

Dated: November 3, 2021 Respectfully Submitted,

Respectfully Submitted,

/s/ Katherine Haas

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1                   **CERTIFICATE OF SERVICE**

2                   I certify that on the date noted below I electronically filed the foregoing document  
3                   with the Clerk of the Court using the CM/ECF system, which will send notification of  
4                   such filing to all registered CM/ECF participants.

5                   Dated this 3rd day of November, 2021.  
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7                   /s/ Moises Soto-Brito \_\_\_\_\_  
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